

Thu Jul 14 16:01:22 EDT 2022
EPAExecSec <EPAExecSec@epa.gov>
FW: Letter to Regulate Pyrolysis & Gasification Incinerators
To: "CMS.OEX" <cms.oex@epa.gov>

Reading file

From: Graham Hamilton <graham@breakfreefromplastic.org>
Sent: Thursday, July 14, 2022 3:33 PM
To: Regan, Michael <Regan.Michael@epa.gov>
Cc: McCabe, Janet <McCabe.Janet@epa.gov>; Goffman, Joseph <Goffman.Joseph@epa.gov>; Utech, Dan <Utech.Dan@epa.gov>; Cope, Grant <Cope.Grant@epa.gov>; peggy@weact.org
Subject: Letter to Regulate Pyrolysis & Gasification Incinerators

Dear Administrator Regan,

Please see the attached letter from over 100 organizations who are concerned about the EPA's apparent willingness to enable so-called “chemical recycling” or “advanced recycling,” misleading umbrella terms fashioned by the plastics industry to greenwash incineration technologies, namely pyrolysis and gasification.

We look forward to your thoughts on this important issue and welcome any opportunity to meet with you and your staff to discuss.

Respectfully,

--

Graham Hamilton

US Policy Officer

#break**free**fromplastic

Based on Coast Salish lands (PST)

gender pronouns: he/him/him

graham@breakfreefromplastic.org

www.breakfreefromplastic.org

Need to connect? [Schedule a meeting](#)

July 14, 2022

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Dear Administrator Regan,

Thank you for all that you are doing at the EPA to center the needs and concerns of environmental justice communities across the country. We are grateful for your leadership and the critical actions you have committed to in the wake of your Journey to Justice Tour. We look forward to supporting any and all efforts to center the needs and demands of frontline communities who have been neglected for far too long.

We, the undersigned, are writing today to express our deep concern over the EPA's apparent willingness to enable so-called "chemical recycling" or "advanced recycling," misleading umbrella terms fashioned by the petrochemical industry to greenwash incineration technologies, namely pyrolysis and gasification.

As you know, the Trump EPA sought to exempt pyrolysis and gasification incinerators from Section 129 of the Clean Air Act which regulates solid waste combustion. The practical effect of such a move would be to allow these incinerators to operate without pollution controls, without emission limits or monitoring requirements, and without accountability to the predominantly poor and minority communities where they operate. There are no other federal standards that apply to pyrolysis and gasification incinerators. Trying to issue new regulations for them under Section 112 would be a difficult and time-consuming process: first EPA would need to list them as a new category of area sources under Section 112(c)(3) and then EPA would need to promulgate new standards for the newly created category. A positive outcome for such a process would be highly uncertain and would take years, if not decades.

It is alarming that the Trump Administration's unlawful move to eliminate critical health protections for communities living in close proximity to these facilities has not been withdrawn by the Biden Administration. If the EPA does not regulate pyrolysis and gasification incinerators under Section 129, it would effectively strip emissions regulations and monitoring requirements for some of the most hazardous air pollutants regulated under the Clean Air Act, including lead, cadmium, mercury, and dioxins. Equally alarming is the inclusion of "advanced recycling" in the EPA's 2021 National Recycling Strategy. You are right to point out in your introduction to the strategy that Americans are confused about what materials can be recycled. Industry is preying upon that confusion to push a fantastical technology that to date has not been proven

effective, economically viable, or safe. You also rightly state that living near recycling facilities takes a toll on already overburdened communities when materials are not properly managed. Exempting pyrolysis and gasification incinerators and incentivizing their application to mixed plastic waste streams will only compound the threats these communities are facing.

The vast majority of what industry refers to as “advanced recycling” are actually plastic-to-fuel operations where plastic feedstocks are partially burned to create diesel fuels or synthetic gas (syngas). These fuels are typically burned onsite to operate the plant itself or blended with cleaner commercial fuels and burned elsewhere. There is ample evidence to suggest that uncontrolled emissions from these processes pose significant health and safety risks for local populations, placing a heavy toxic burden on workers and surrounding communities, the majority of which are low income and communities of color.

Over the last 20 years, roughly 40 plastic-to-fuel and “advanced recycling” facilities have come online in the U.S., all but a handful shuttered by insurmountable technical failures and the exorbitant cost of sourcing, transporting, and cleaning what has proven an intrinsically contaminated feedstock. Of the plants supposedly still in operation, none of them are creating new plastic, despite their claims. In 2018, Oregon-based Agilix, a polystyrene pyrolysis plant that purports to create virgin-like styrene and is held up by industry as the paragon of “advanced recycling,” sent nearly 500,000 lbs of hazardous waste to be burned in cement kilns across the country, polluting the air in communities like Tacoma, Wash. and Hannibal, Mo. with benzene and vinyl chloride.

Let us be absolutely clear: there is nothing advanced, sustainable, or circular about incinerating plastic back into a fossil fuel to be combusted, nor should any such process be considered recycling. We know that burning plastic creates significant GHG emissions while simultaneously releasing a host of known human carcinogens and neurotoxins. The EPA has a legal and moral obligation to uphold the regulatory standards that serve to minimize community exposure to hazardous pollutants emitted during industrial processes. Burning plastic in order to create and combust low-quality fuels is incompatible with a climate safe future and directly contradicts the Biden Administration’s commitment to center the needs of environmental justice communities across the country.

With global plastic production expected to triple by 2050, the plastics industry is looking for ways to counter the growing global movement to dramatically reduce the production of plastic that is choking the environment and poisoning the planet. But techno-pseudo-fixes like “advanced recycling” will do nothing to eliminate waste or create the kind of resilient and sustainable future our children deserve. On the contrary, if the EPA enables these deceptive industry schemes and chooses to exempt pyrolysis and gasification units from Section 129 of the Clean Air Act it will only incentivize petrochemical expansion and the buildout of plastic incineration infrastructure, while deepening environmental injustice and permanently locking us into a future of limitless plastic production, consumption, and waste.

We strongly urge the EPA to withdraw the proposal to exempt pyrolysis and gasification incinerators from Section 129 of the Clean Air Act and ensure that regulations to protect vulnerable communities from the impacts of industrial pollution remain intact. We appreciate your attention to this critical issue and would welcome the opportunity to meet with you to discuss the climate and environmental justice impacts of plastic burning and so-called “advanced recycling” schemes.

Sincerely,

Jim Pew
Senior Attorney
Earthjustice

Frankie Orona
Executive Director
Society of Native Nations

Judith Enck
President
Beyond Plastics

Bianca Lopez
Co-Founder, Director
Valley Improvement Projects

Jane Williams
Executive Director
California Communities Against Toxics

Daniel Rosenberg
Director of Federal Toxics Policy
Natural Resources Defense Council

Lisa Ramsden
Senior Oceans Campaigner
Greenpeace USA

Martin Bourque
Executive Director
Ecology Center

Yvette Arellano
Founder, Executive Director
Fenceline Watch

Monica Wilson
Associate Director
Global Alliance for Incinerator Alternatives

Sonya Lunder
Senior Toxics Policy Advisor
Sierra Club

Renee Sharp
Strategic Advisor
Safer States

Sarah Packer
Director, Petrochemicals, Plastics & Climate
Center for Environmental Health

Shannon Smith
Executive Director
FracTracker Alliance

Matthew Davis
Senior Director, Government Affairs
League of Conservation Voters

Stephanie Erwin
Director of Circular Economy Policy
American Sustainable Business Network

John Beard Jr.
CEO
Port Arthur Community Action Network

Melissa Miles
Executive Director
New Jersey Environmental Justice Alliance

Nicole Kurian
Policy Analyst

Marcie Kever
Oceans & Vessels Program Director

Californians Against Waste

Dr. Anja Brandon
US Plastics Policy Analyst
Ocean Conservancy

KT Andresky
Campaign Organizer
Breathe Free Detroit

Esteban Areanas-Pino
Policy Associate
Climate Justice Alliance

Amanda Kiger
Executive Director
River Valley Organizing

Alison Waliszewski
Policy & Outreach Manager
5 Gyres Institute

Alexandria Gordon
Campus Organizer
Student PIRGS

Christopher Chin
Executive Director
Center for Oceanic Awareness,
Research and Education (COARE)

Barbara Beesley
Outreach Coordinator
IHM Sisters Justice, Peace &
Sustainability Office

Drew Hudson
Founder
198 Methods

JL Andrepont, MPA, PhDc
Senior Policy Campaigner & Analyst
350.org

Pamela Miller
Executive Director
Alaska Community Action on Toxics

Friends of the Earth

Anni Hanna
Director
New Mexico Climate Justice

Christy Leavitt
Plastics Campaign Director
Oceana

Dianna Cohen
Co-Founder, CEO
Plastic Pollution Coalition

Anthony Tusino
Senior Officer, Plastic Policy Advocacy
World Wildlife Fund

Alejandra Warren
Executive Director
Plastic Free Future

Anne Petermann
Executive Director
Global Justice Ecology Project

Crystal Jackson Parker
President
North Ave & Hilton Street Business
Community Task Force

Bobby Jones
President
Down East Coal Ash Environmental &
Social Justice Coalition

Gabby Ross
Assateague Coastkeeper
Assateague Coastal Trust

Lisa Giordano
Executive Director
Association of Young Americans (AYA)

Teresa Mills
Executive Director
Buckeye Environmental Network

Sarah Steward
President
Animals Are Sentient Beings, Inc.

Lisa DePaoli
Communications Manager
Center for Coalfield Justice

Sarah Woodbury
Director of Advocacy
Defend Our Health

Bridge Rauch
Environmental Justice Organizer
Clean Air Coalition

Bobbi Wilding
Executive Director
Clean & Healthy New York

Lynn Thorp
National Campaigns Director
Clean Water Action

Barbara W Brandom, MD
Steering Committee Member
Concerned Health Professionals
of Pennsylvania

Kate Bailey
Policy Director
Eco-Cycle

Sharon Lewis
Director
CT Coalition for Economic &
Environmental Justice

Patricia Taylor
Director of the Plastics & Waste
Reduction Project
Environment & Human Health, Inc.

Leah Redwood
Action Coordinator
Extinction Rebellion SF Bay

Robina Suwol
Executive Director
California Safe Schools

Lee McNair
Co-Leader
Cedar Lane Environmental Justice Ministry

Celeste McMickle
Founder
Celestial Solutions

Stephen Brittle
President
Don't Waste Arizona

Mary Gutierrez
Director
Earth Action, Inc.

Diane Wittner
Principal
Echotopia LLC

Tracy Frisch
Founder, Lead Organizer
Clean Air Action Network
of Glenn Falls, NY

Kimberly Miller
Member
FoCo Trash Mob

Rev. Sharon Buttry
Facilitator
Detroit Hamtramck Coalition for
Advancing Healthy Environments

Sue Lee Mossman
Chair
Humboldt Unitarian Universalist Fellowship's
Climate Action Campaign

Nezahualcoyotl Xiuhtecutli
General Coordinator
Farmworker Association of Florida

Kathy Kerridge
Board Member
Good Neighbor Steering Committee
of Benicia

Patricia Wood
Executive Director
Grassroots Environmental Education

Hanna Testa
Director
Hannah4Change

Neil Seldman
Director
Institute for Local Self-Reliance

Nancy LaPlaca
Principal
LaPlaca & Associates, LLC

Dave Arndt
Director
Locust Point Community Garden

Dave Shukla
Operations
Long Beach Alliance for Clean Energy

Juan Jhong-Chung
Climate Justice Director
Michigan Environmental Justice Coalition

Sam Pearse
Lead Campaigner
Story of Stuff Project

Elizabeth O’Nan
Director
Protect All Children’s Environment

Timothy Whitehouse
Executive Director
Public Employees for
Environmental Responsibility

Bradley Angel
Executive Director
Greenaction for Health &
Environmental Justice

Molly Rauch
Public Health Policy Director
Mom’s Clean Air Force

Kathleen Curtis
Founding Director
Moms for a Nontoxic New York

Johanna Fallert
Co-Leader
Mother’s Out Front - Dutchess, NY

Guy Jacob
Conservation Chair
Nassau Hiking & Outdoor Club

Bob Gedert
President
National Recycling Coalition

Diana Bohn
Co-Coordinator
Nicaragua Center for Community Action

Trevor Jones
Campaign Manager
Only One

Liz Hitchcock
Director
Safer Chemicals, Healthy Families

Wendy Morrill
President
South Coast Neighbors United

Charlene Lemoine
Waste Issues Representative
Waukesha County Environmental
Action League

Brien Weiner
President
South Shore Audubon Society

Jean Tepperman
Co-Coordinator
Sunflower Alliance

Jennifer Savage
Senior Manager, Plastic Pollution Initiative
Surfrider Foundation

Timothy Edward Duda
Director
Terra Advocati

Josephine Gingerich
Regional Organizer - Appalachia
Climate Reality Project

Jean Ross
Board President
Vote Climate

Caleb Merendino
Co-Founder
Waterway Advocates

Deborah Steward Anderson
Coordinator
Zero Waste Detroit

Graham Hamilton
US Policy Officer
Break Free From Plastic

Jan Dell
Founder, Independent Engineer
The Last Beach Cleanup

Jackie Nunez
Founder
The Last Plastic Straw

Joanie Steinhaus
Gulf Program Director
Turtle Island Restoration Network

John Blair
President
Valley Watch, Inc.

Paul Burns
Executive Director
Vermont Public Interest Research Group

Richard Anthony
Chairman
Zero Waste International Alliance

Yayoi Koizumi
Founder
Zero Waste Ithaca

Sue Maxwell
Chair
Zero Waste BC

Ruth Abbe
President
Zero Waste USA

CC:

Janet McCabe, Deputy Administrator, Environmental Protection Agency
Dan Utech, Chief of Staff, Environmental Protection Agency
Joe Goffman, Principal Deputy Assistant Administrator, Environmental Protection Agency
Grant Cope, Senior Counselor to the Administrator, Environmental Protection Agency
Richard Moore, Co-Chair, White House Environmental Justice Advisory Council
Peggy Shepard, Co-Chair, White House Environmental Justice Advisory Council

Message

From: McIntosh-Kastrinsky, Rachel [McIntoshKastrinsky.Rachel@epa.gov]
Sent: 12/15/2022 4:29:14 PM
To: Campbell, Ann [Campbell.Ann@epa.gov]; Carbonell, Tomas [Carbonell.Tomas@epa.gov]; Deluca, Isabel [DeLuca.Isabel@epa.gov]; Giles, Cynthia [Giles.Cynthia@epa.gov]; Goffman, Joseph [Goffman.Joseph@epa.gov]; Hooper, Daniel [hooper.daniel@epa.gov]; Macedonia, Jennifer [Macedonia.Jennifer@epa.gov]; Millett, John [Millett.John@epa.gov]; Niebling, William [Niebling.William@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Rakosnik, Delaney [rakosnik.delaney@epa.gov]; Shaw, Betsy [Shaw.Betsy@epa.gov]; Shoaff, John [Shoaff.John@epa.gov]
Subject: MEETING MATERIALS REVIEW: Hybrid Meeting: Monthly IRA Implementation Meeting -- OAR Programs, 12/16, 10:15am
Attachments: AO EPA Briefing Memo CPRG 12-19-2022.docx; Climate poll reduc grants overview for DA 12-19-2022.pptx

Good Morning,

Attached are the materials for your review and to send forward to the Deputy Administrator for Monday's (12/19) Hybrid Meeting: Monthly IRA Implementation Meeting -- OAR Programs meeting at 10:15am. Please let me know if you have any questions. Thank you.

Rachel McIntosh-Kastrinsky
OAQPS Special Assistant
Office of Air and Radiation
U.S. Environmental Protection Agency
(919) 541-5647
Pronouns: she, her, hers

-----Original Appointment-----

From: McCabe, Janet <McCabe.Janet@epa.gov>
Sent: Thursday, September 22, 2022 9:53 AM
To: McCabe, Janet; Utech, Dan; Hoover, Zealan; Arroyo, Victoria; Goffman, Joseph; Giles, Cynthia; Carbonell, Tomas; Shaw, Betsy; Macedonia, Jennifer; Benkeser, Anna; Chang, Alice
Cc: Polachek, Maggie; Monger, Jon; Drinkard, Andrea
Subject: Hybrid Meeting: Monthly IRA Implementation Meeting -- OAR Programs
When: Monday, December 19, 2022 10:15 AM-11:00 AM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting + WJC-N Room 3412; DCRoomWJCN3406A/DeputyAdministrator

Message

From: Benkeser, Anna [Benkeser.Anna@epa.gov]
Sent: 1/19/2023 7:42:14 PM
To: Lamson, Amy (she/her/hers) [Lamson.Amy@epa.gov]
CC: Macedonia, Jennifer [Macedonia.Jennifer@epa.gov]; OAR Briefings [OAR_Briefings@epa.gov]; Brachtl, Megan [Brachtl.Megan@epa.gov]; Profeta, Timothy [Profeta.Timothy@epa.gov]
Subject: MATERIALS FOR 01/23 "Hybrid Meeting: IRA Biweekly Briefing" @10:30AM
Attachments: AO EPA Briefing Memo CPRG 01-17-2023.docx; Update for AO on CPRG 01-23-23_vF.pptx

Importance: High

Message

From: Morgan, Ashley [Morgan.Ashley.M@epa.gov]
Sent: 3/21/2023 11:52:00 AM
To: Utech, Dan [Utech.Dan@epa.gov]; Lucey, John [Lucey.John.D@epa.gov]; Del Monico, Tim [DelMonico.Tim@epa.gov]; Carbonell, Tomas [Carbonell.Tomas@epa.gov]; Goffman, Joseph [Goffman.Joseph@epa.gov]; Tsirigotis, Peter [Tsirigotis.Peter@epa.gov]
CC: Chen, Royce (he/him/his) [Chen.Royce@epa.gov]
Subject: RE: Updated Manchin Memo
Attachments: 2023 03 21 Manchin Meeting Memo (1).docx

With more specifics on BIL and IRA here.

From: Morgan, Ashley
Sent: Monday, March 20, 2023 8:48 PM
To: Utech, Dan <Utech.Dan@epa.gov>; Lucey, John <Lucey.John.D@epa.gov>; Del Monico, Tim <DelMonico.Tim@epa.gov>; Carbonell, Tomas <Carbonell.Tomas@epa.gov>; Goffman, Joseph <Goffman.Joseph@epa.gov>; Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>
Cc: Chen, Royce (he/him/his) <Chen.Royce@epa.gov>
Subject: Updated Manchin Memo

Hi there –

Attached is the updated Senator Manchin memo with the talking points folks sent around earlier. Please let me know if you have any edits. This will be going into the Administrator's book first thing in the morning.

Thanks!
Ashley

Ashley M. Morgan
Special Advisor for Senate Relations
U.S. Environmental Protection Agency
Cell: (202) 909-9983



Briefing Memo – December 1 Briefing: Greenhouse Gas Reduction Fund

Printed on 11/30/2022

Filed: 11/30/2022 11:45 AM

APPROVED BY: DAN UTECH

EVENT MEMO

November 29, 2022

MEMORANDUM FOR THE ADMINISTRATOR

FROM: Dan Utech
SUBJECT: Greenhouse Gas Reduction Fund Briefing
EVENT DATE: Thursday, December 1, 2022
TIME: 4:30-5:15pm
LOCATION: Hybrid

I. STATEMENT OF PURPOSE

You will meet with the team that has been leading initial development of the Greenhouse Gas Reduction Fund program for a briefing on progress to-date, upcoming design decisions, and the timeline going into 2023. The meeting will focus on the materials in the attached PowerPoint presentation. The team has also attached a white paper with additional context on upcoming design decisions.

II. PARTICIPANTS

EPA:

- YOU
- Deputy Administrator McCabe
- Victoria Arroyo
- Robin Collin
- Cynthia Giles
- Joseph Goffman, OAR
- Zealan Hoover
- Alejandra Nunez
- Tim Profeta
- Natalia Sorgente
- Dan Utech
- Susannah Weaver

[PAGE] of [NUMPAGES]

Briefing Memo – December 1 Briefing: Greenhouse Gas Reduction Fund

Printed on 11/30/2022

- Rachel Zuckerman

White House:

- Jahi Wise

III. PRESS PLAN

Closed press

IV. ATTACHMENTS

- Briefing deck
- Program design white paper

Message

From: Utech, Dan [Utech.Dan@epa.gov]
Sent: 12/5/2022 10:52:29 PM
To: Cassady, Alison [Cassady.Alison@epa.gov]; Hoover, Zealan [Hoover.Zealan@epa.gov]; Collin, Robin [Collin.Robin@epa.gov]; Giles, Cynthia [Giles.Cynthia@epa.gov]; Profeta, Timothy [Profeta.Timothy@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Arroyo, Victoria [Arroyo.Victoria@epa.gov]; McCabe, Janet [McCabe.Janet@epa.gov]; Weaver, Susannah [Weaver.Susannah@epa.gov]
CC: Goffman, Joseph [Goffman.Joseph@epa.gov]; Atkinson, Emily [Atkinson.Emily@epa.gov]; Willis, Sharnett [Willis.Sharnett@epa.gov]; Dickerson, Aaron [dickerson.aaron@epa.gov]; Fine, Philip [Fine.Philip@epa.gov]; Sorgente, Natalia [Sorgente.Natalia@epa.gov]
Subject: GGRF Discussion

Team – with Ale and other OAR staff stepping back, and with Jahi and other staff joining the AO to work on GGRF, I’m pulling down this series of meetings. We’ll reassess how to best engage this group going forward and will reach back soon with a new schedule. Thanks, Dan

Message

From: McCabe, Janet [McCabe.Janet@epa.gov]
Sent: 8/4/2022 12:36:29 PM
To: Goffman, Joseph [Goffman.Joseph@epa.gov]
Subject: FW: Choose Your Favorite Caption

A priceless photo....

From: Lucey, John <Lucey.John.D@epa.gov>
Sent: Thursday, August 4, 2022 8:33 AM
To: McCabe, Janet <McCabe.Janet@epa.gov>; Fine, Philip <Fine.Philip@epa.gov>; Hamilton, Lindsay <Hamilton.Lindsay@epa.gov>; Hoffer, Melissa <Hoffer.Melissa@epa.gov>
Subject: FW: Choose Your Favorite Caption

From last week's ECOS conference

From: Ben Grumbles <bgrumbles@ecos.org>
Sent: Thursday, July 28, 2022 10:06 AM
To: goffman.joe@epa.gov; profeta.tim@epa.gov; Lucey, John <Lucey.John.D@epa.gov>
Subject: Choose Your Favorite Caption



Message

From: Cassady, Alison [Cassady.Alison@epa.gov]
Sent: 8/16/2022 4:14:42 PM
To: Goffman, Joseph [Goffman.Joseph@epa.gov]
Subject: RE: GHG Reduction Fund -- Draft Work Plan

WHY DO YOU HATE ME

Alison L. Cassady
Deputy Chief of Staff for Policy
U.S. Environmental Protection Agency
Cell: (202) 941-6036

From: Goffman, Joseph <Goffman.Joseph@epa.gov>
Sent: Tuesday, August 16, 2022 12:00 PM
To: Hoover, Zealan <Hoover.Zealan@epa.gov>; Utech, Dan <Utech.Dan@epa.gov>; McCabe, Janet <McCabe.Janet@epa.gov>; Collin, Robin <Collin.Robin@epa.gov>
Cc: Nunez, Alejandra <Nunez.Alejandra@epa.gov>; Profeta, Timothy <Profeta.Timothy@epa.gov>; Giles, Cynthia <Giles.Cynthia@epa.gov>; Cassady, Alison <Cassady.Alison@epa.gov>
Subject: RE: GHG Reduction Fund -- Draft Work Plan

Thanks for the catch. Meant to include Alison on the original email.

Joseph Goffman
Principal Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency

From: Hoover, Zealan <Hoover.Zealan@epa.gov>
Sent: Tuesday, August 16, 2022 11:50 AM
To: Goffman, Joseph <Goffman.Joseph@epa.gov>; Utech, Dan <Utech.Dan@epa.gov>; McCabe, Janet <McCabe.Janet@epa.gov>; Collin, Robin <Collin.Robin@epa.gov>
Cc: Nunez, Alejandra <Nunez.Alejandra@epa.gov>; Profeta, Timothy <Profeta.Timothy@epa.gov>; Giles, Cynthia <Giles.Cynthia@epa.gov>; Cassady, Alison <Cassady.Alison@epa.gov>
Subject: RE: GHG Reduction Fund -- Draft Work Plan

Looking forward to it. Looping in Alison as well.

Zealan

From: Goffman, Joseph <Goffman.Joseph@epa.gov>
Sent: Tuesday, August 16, 2022 10:49 AM
To: Utech, Dan <Utech.Dan@epa.gov>; McCabe, Janet <McCabe.Janet@epa.gov>; Collin, Robin <Collin.Robin@epa.gov>
Cc: Hoover, Zealan <Hoover.Zealan@epa.gov>; Nunez, Alejandra <Nunez.Alejandra@epa.gov>; Profeta, Timothy <Profeta.Timothy@epa.gov>; Giles, Cynthia <Giles.Cynthia@epa.gov>
Subject: GHG Reduction Fund -- Draft Work Plan
Importance: High

With thanks to the brilliant work of Ale, Cynthia, and Tim. We will be prepared to walk through this at our meeting later today. Thanks.

Joseph Goffman
Principal Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency

Message

From: Hoover, Zealan [Hoover.Zealan@epa.gov]
Sent: 8/16/2022 10:43:49 PM
To: Goffman, Joseph [Goffman.Joseph@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Profeta, Timothy [Profeta.Timothy@epa.gov]; Giles, Cynthia [Giles.Cynthia@epa.gov]; Utech, Dan [Utech.Dan@epa.gov]; McCabe, Janet [McCabe.Janet@epa.gov]; Cassidy, Alison [Cassady.Alison@epa.gov]
Subject: Hoover, Zealan shared the folder "IRA Staffing" with you.



Hoover, Zealan shared a folder with you

Here's the folder that Hoover, Zealan shared with you.



IRA Staffing



This link only works for the direct recipients of this message.



Message

From: McCabe, Janet [McCabe.Janet@epa.gov]
Sent: 8/26/2022 1:24:31 PM
To: Goffman, Joseph [Goffman.Joseph@epa.gov]; Utech, Dan [Utech.Dan@epa.gov]; Hoover, Zealan [Hoover.Zealan@epa.gov]
CC: Giles, Cynthia [Giles.Cynthia@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Profeta, Timothy [Profeta.Timothy@epa.gov]
Subject: RE: GHG Fund Administrator Discussion Materials

Great. Thanks, Joe and team.

From: Goffman, Joseph <Goffman.Joseph@epa.gov>
Sent: Thursday, August 25, 2022 4:35 PM
To: Utech, Dan <Utech.Dan@epa.gov>; McCabe, Janet <McCabe.Janet@epa.gov>; Hoover, Zealan <Hoover.Zealan@epa.gov>
Cc: Giles, Cynthia <Giles.Cynthia@epa.gov>; Nunez, Alejandra <Nunez.Alejandra@epa.gov>; Profeta, Timothy <Profeta.Timothy@epa.gov>
Subject: GHG Fund Administrator Discussion Materials

All -- Attached are the final documents that we sent up for the Administrator's book.

Thank you, Dan for the edits and suggestions. After you set the stage, as you suggested, Dan, let's turn it over to Ale, who will be on video.

We're still mulling the slides to figure out what would be helpful.

Thanks, again.

Joseph Goffman
Principal Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency

Message

From: Hengst, Benjamin [Hengst.Benjamin@epa.gov]
Sent: 9/11/2022 8:14:15 PM
To: Utech, Dan [Utech.Dan@epa.gov]; Goffman, Joseph [Goffman.Joseph@epa.gov]
CC: Dickerson, Aaron [dickerson.aaron@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Lance, Kathleen [Lance.Kathleen@epa.gov]; Meza, Michelle [Meza.Michelle@epa.gov]
Subject: RE: OAR Briefings tomorrow
Attachments: 2022.09.12 RFS slides v2.pptx

Dan—here are a few additional slides OAR has put together for potential use. Thanks—Ben

From: Utech, Dan <Utech.Dan@epa.gov>
Sent: Sunday, September 11, 2022 1:49 PM
To: Hengst, Benjamin <Hengst.Benjamin@epa.gov>; Goffman, Joseph <Goffman.Joseph@epa.gov>
Cc: Dickerson, Aaron <dickerson.aaron@epa.gov>; Nunez, Alejandra <Nunez.Alejandra@epa.gov>; Dunham, Sarah <Dunham.Sarah@epa.gov>; Lance, Kathleen <Lance.Kathleen@epa.gov>; Meza, Michelle <Meza.Michelle@epa.gov>
Subject: RE: OAR Briefings tomorrow

If there isn't anything more recent, I think the options selection memo and slides would work fine.

From: Hengst, Benjamin <Hengst.Benjamin@epa.gov>
Sent: Sunday, September 11, 2022 1:01 PM
To: Utech, Dan <Utech.Dan@epa.gov>; Goffman, Joseph <Goffman.Joseph@epa.gov>
Cc: Dickerson, Aaron <dickerson.aaron@epa.gov>; Nunez, Alejandra <Nunez.Alejandra@epa.gov>; Dunham, Sarah <Dunham.Sarah@epa.gov>; Lance, Kathleen <Lance.Kathleen@epa.gov>; Meza, Michelle <Meza.Michelle@epa.gov>
Subject: RE: OAR Briefings tomorrow

OK, I'll see what off-the-shelf materials we can use.

From: Utech, Dan <Utech.Dan@epa.gov>
Sent: Sunday, September 11, 2022 12:41 PM
To: Goffman, Joseph <Goffman.Joseph@epa.gov>
Cc: Dickerson, Aaron <dickerson.aaron@epa.gov>; Nunez, Alejandra <Nunez.Alejandra@epa.gov>; Dunham, Sarah <Dunham.Sarah@epa.gov>; Hengst, Benjamin <Hengst.Benjamin@epa.gov>; Lance, Kathleen <Lance.Kathleen@epa.gov>; Meza, Michelle <Meza.Michelle@epa.gov>
Subject: Re: OAR Briefings tomorrow

Thanks Joe. I spoke to him Friday and he asked for off the shelf briefing materials, which I was planning to pull. But if oar could do that, all the better. I was also planning to put some basic tps together. I'm happy to do that part. Joe perhaps we can find a few minutes this afternoon to discuss that. I'm available all day - just let me know what works for you.

On Sep 11, 2022, at 12:26 PM, Goffman, Joseph <Goffman.Joseph@epa.gov> wrote:

Is there a plan for preparing him for this meeting?

Ben/Sarah - let's at least pull some off-the-shelf material to send to the AO ASAP. Thanks

Sent from my iPhone

On Sep 11, 2022, at 5:22 PM, Dickerson, Aaron <dickerson.aaron@epa.gov> wrote:

Got it. Thanks Joe.

From: Goffman, Joseph <Goffman.Joseph@epa.gov>

Sent: Sunday, September 11, 2022 12:21 PM

To: Dickerson, Aaron <dickerson.aaron@epa.gov>

Subject: Re: OAR Briefings tomorrow

Let's keep OS for 111 on Monday and do EG on 2015 Ozone Transport on Friday. Thanks

Sent from my iPhone

On Sep 11, 2022, at 4:47 PM, Dickerson, Aaron
<dickerson.aaron@epa.gov> wrote:

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Aaron Dickerson
Office of the Administrator
U.S. EPA
Cell: 202-689-4794

Message

From: Hengst, Benjamin [Hengst.Benjamin@epa.gov]
Sent: 9/11/2022 6:21:26 PM
To: Utech, Dan [Utech.Dan@epa.gov]; Goffman, Joseph [Goffman.Joseph@epa.gov]
CC: Dickerson, Aaron [dickerson.aaron@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Lance, Kathleen [Lance.Kathleen@epa.gov]; Meza, Michelle [Meza.Michelle@epa.gov]
Subject: RE: OAR Briefings tomorrow
Attachments: 2022 01 04 OAR Briefing Memo for Set Rule Proposal Options Selection.docx; 2022 01 04 OAR Options Selection for Set Rule Slide Deck.pptx

I've attached the O.S. memo and slides. I have a few other slides I'm pulling together that walk through what we think the Administrator might hear at the meeting; I'll send those a little later this afternoon.

From: Utech, Dan <Utech.Dan@epa.gov>
Sent: Sunday, September 11, 2022 1:49 PM
To: Hengst, Benjamin <Hengst.Benjamin@epa.gov>; Goffman, Joseph <Goffman.Joseph@epa.gov>
Cc: Dickerson, Aaron <dickerson.aaron@epa.gov>; Nunez, Alejandra <Nunez.Alejandra@epa.gov>; Dunham, Sarah <Dunham.Sarah@epa.gov>; Lance, Kathleen <Lance.Kathleen@epa.gov>; Meza, Michelle <Meza.Michelle@epa.gov>
Subject: RE: OAR Briefings tomorrow

If there isn't anything more recent, I think the options selection memo and slides would work fine.

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Sent: Sunday, September 11, 2022 12:21 PM

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Aaron Dickerson
Office of the Administrator
U.S. EPA
Cell: 202-689-4794

Message

From: Nunez, Alejandra [Nunez.Alejandra@epa.gov]
Sent: 9/21/2022 2:53:57 AM
To: McCabe, Janet [McCabe.Janet@epa.gov]; Utech, Dan [Utech.Dan@epa.gov]; Goffman, Joseph [Goffman.Joseph@epa.gov]; Giles, Cynthia [Giles.Cynthia@epa.gov]; Profeta, Timothy [Profeta.Timothy@epa.gov]; Hoover, Zealan [Hoover.Zealan@epa.gov]; Arroyo, Victoria [Arroyo.Victoria@epa.gov]; Cassady, Alison [Cassady.Alison@epa.gov]
Subject: RE: GHG Reduction Fund - Draft Outreach Plan (003).docx

Thank you, Janet.

From: McCabe, Janet <McCabe.Janet@epa.gov>
Sent: Tuesday, September 20, 2022 8:35 PM
To: Utech, Dan <Utech.Dan@epa.gov>; Goffman, Joseph <Goffman.Joseph@epa.gov>; Giles, Cynthia <Giles.Cynthia@epa.gov>; Profeta, Timothy <Profeta.Timothy@epa.gov>; Nunez, Alejandra <Nunez.Alejandra@epa.gov>; Hoover, Zealan <Hoover.Zealan@epa.gov>; Arroyo, Victoria <Arroyo.Victoria@epa.gov>; Cassady, Alison <Cassady.Alison@epa.gov>
Subject: GHG Reduction Fund - Draft Outreach Plan (003).docx

Here are some thoughts from me on the outreach plan, FWIW. I hope I didn't leave anyone off.

Janet

Message

From: Niebling, William [Niebling.William@epa.gov]
Sent: 9/26/2022 3:24:35 PM
To: Cassady, Alison [Cassady.Alison@epa.gov]; Utech, Dan [Utech.Dan@epa.gov]; Goffman, Joseph [Goffman.Joseph@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Profeta, Timothy [Profeta.Timothy@epa.gov]; Hoover, Zealan [Hoover.Zealan@epa.gov]; Giles, Cynthia [Giles.Cynthia@epa.gov]; McCabe, Janet [McCabe.Janet@epa.gov]
CC: Laverdiere, Maria [Laverdiere.Maria@epa.gov]
Subject: RE: Dingell - GHG Reduction Fund
Attachments: 2022-8-12 Congressional Record.pdf

+ Maria for her awareness ahead of the Dingell lunch on Friday.

From: Cassady, Alison <Cassady.Alison@epa.gov>
Sent: Monday, September 26, 2022 10:47 AM
To: Utech, Dan <Utech.Dan@epa.gov>; Niebling, William <Niebling.William@epa.gov>; Goffman, Joseph <Goffman.Joseph@epa.gov>; Nunez, Alejandra <Nunez.Alejandra@epa.gov>; Profeta, Timothy <Profeta.Timothy@epa.gov>; Hoover, Zealan <Hoover.Zealan@epa.gov>; Giles, Cynthia <Giles.Cynthia@epa.gov>; McCabe, Janet <McCabe.Janet@epa.gov>
Subject: Dingell - GHG Reduction Fund

In case you haven't seen this, Rep. Dingell's statement in support of IRA focused on the GHG Reduction Fund. See page H7702 of the attached.

Mrs. DINGELL. Madam Speaker, I rise in strong support of the Inflation Reduction Act we are considering today and would like to speak specifically to the inclusion of the Greenhouse Gas Reduction Fund, which is based on important legislation I authored to address the climate crisis.

The Inflation Reduction Act appropriates \$27 billion to the Environmental Protection Agency (EPA) to finance climate specific projects that will reduce carbon emissions, which will be dispensed through the Greenhouse Gas (GHG) Reduction Fund. The GHG Reduction Fund is the product of more than 13 years of legislative effort by numerous members of the House and Senate and provides resources to fulfill the vision and mission of this legislative effort to capitalize a national climate bank that will support a swift transition to an equitable, clean-energy economy.

In the House, the GHG Reduction Fund is based on H.R. 806, the Clean Energy and Sustainability Accelerator Act. I introduced this important legislation to provide the maximum funding possible to and capitalize a single independent, non-profit national financing institution ("NNFI")—the first ever national green bank—that would in turn make its financial and technical resources available to communities across the country. It is our hope, as the administration implements the GHG Reduction Fund, it will consider the benefits and structure of the Clean Energy and Sustainability Accelerator Act.

It is our hope the Environmental Protection Agency would make awards through the GHG Reduction Fund to capitalize a single NNFI, as intended under the Clean Energy and Sustainability Accelerator Act, and for that NNFI to use that capitalization funding to leverage private investment in amounts several times greater than the initial public investment. Once capitalized, the bill requires the entity to make direct investments into qualified projects at the national, regional, state, and local levels and, importantly, to make indirect investments into such projects by providing financial and technical assistance to an open, inclusive, and ever-expanding network of state and local nonprofit financial institutions—including existing and newly established green banks and community development finance institutions—that are committed to making investments in the products that will compose the clean power platform on which the economy must run.

The GHG Reduction Fund makes an historic investment into low income and disadvantaged communities as well, mandating that at least 40 percent of the over \$20 billion be used to benefit qualified projects and the financing entities that support qualified projects within these communities, but we expect that the full investment in these communities will be far larger through leverage and investments from the remainder of the Fund.

The GHG Reduction Fund, and the American people, would benefit most and achieve its purpose most effectively through the capitalization of a single independent NNFI, as originally intended in the Clean Energy and Sustainability Accelerator Act. A single independent NNFI will not be limited by any jurisdictional boundary—no community is beyond its reach. Therefore, the NNFI approach could directly invest in qualified projects anywhere in the United States that would otherwise lack funding. In addition, the NNFI approach can indirectly invest in any community by providing the funding and technical assistance necessary to establish new financial institutions and further capitalize and strengthen existing ones. The NNFI would grow a diverse, open, and inclusive network of state and local green banks and other mission driven financing entities.

Capitalizing a single independent NNFI at scale, through the GHG Reduction Fund, would also enable public investment to be leveraged more efficiently which, in turn, drives much greater private capital investment in qualified projects, whether at the national, regional, state, or local level. And the Inflation Reduction Act requires the entity to “retain, manage, recycle, and monetize all repayments and other revenue” generated using the capitalization grant. We count on EPA to assure that the NNFI will be subject to the appropriate regulations and requirements that would apply to similar non-profit institutions that have been capitalized with federal or nonfederal dollars. At the same time, the relationship between EPA and the single independent nonprofit national financing institution should be designed to preserve its operational flexibility and ability to respond quickly to market conditions to execute with the speed that the climate crisis demands.

Finally, the Inflation Reduction Act sets a 180-day period for EPA to complete all these steps: establish the GHG Reduction Fund, issue a grant solicitation, award capitalization grants, and disburse the funds. These aggressive deadlines were established because the GHG Reduction Fund cannot achieve its purpose unless the full amount of funds appropriated to this program are put into use through a NNFI approach immediately. Disbursing all the funds within 180 days through a single independent NNFI, as originally intended under the Clean Energy and Sustainability Accelerator Act will ensure that we can expeditiously address the urgent threat of catastrophic climate change, in an equitable manner, on day 181. A swift disbursement of the maximum funding amount possible will allow the climate bank to leverage more private financing—thereby ensuring our public investment has a far reaching impact.

The impacts of climate change have created an emergency situation that poses a substantial danger to the health and safety of the American public, and the award and disbursement of the maximum amount of funds appropriated to the GHG Reduction Fund cannot be delayed. We recognize that the timeline will require EPA, at every step in the grant process, to evaluate approaches that can reduce the amount of time that it would otherwise take to complete that step—and it is our intention that EPA will utilize all legally-authorized strategies that are necessary to ensure the full amount of the funding is disbursed on time.

Alison L. Cassady
Deputy Chief of Staff for Policy
U.S. Environmental Protection Agency
Cell: (202) 941-6036

Message

From: McCabe, Janet [McCabe.Janet@epa.gov]
Sent: 10/14/2022 1:16:06 AM
To: Goffman, Joseph [Goffman.Joseph@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Profeta, Timothy [Profeta.Timothy@epa.gov]; Utech, Dan [Utech.Dan@epa.gov]; Hoover, Zealan [Hoover.Zealan@epa.gov]; Polachek, Maggie [Polachek.Maggie@epa.gov]; Macedonia, Jennifer [Macedonia.Jennifer@epa.gov]
Subject: resource for states on IRA

In case this of interest, Daniel Esposito of Energy Innovation shared this resource they prepared for states (I was on a panel with him recently about IRA): <https://energyinnovation.org/publication/implementing-the-inflation-reduction-act-a-roadmap-for-state-electricity-policy/>

Janet

Janet G. McCabe, Deputy Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
MC1102A, Room 3412WJCN
Washington, DC 20460
(202)-564-4711
mccabe.janet@epa.gov
She/her/hers

Message

From: McCabe, Janet [McCabe.Janet@epa.gov]
Sent: 10/22/2022 1:15:28 AM
To: Profeta, Timothy [Profeta.Timothy@epa.gov]
CC: Utech, Dan [Utech.Dan@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Hoover, Zealan [Hoover.Zealan@epa.gov]; Goffman, Joseph [Goffman.Joseph@epa.gov]
Subject: Re: kudos!!

Hear, hear. I was really impressed when I saw everything described in the press release.

Sent from my iPhone

On Oct 21, 2022, at 7:58 PM, Profeta, Timothy <Profeta.Timothy@epa.gov> wrote:

Thank you Dan! Onward!

Sent from my iPhone

On Oct 21, 2022, at 7:55 PM, Utech, Dan <Utech.Dan@epa.gov> wrote:

Ale, Zealan, Tim – Kudos to you for sprinting for the last two weeks to get the EFAB process going, the RFI ready, and the announcement out the door! Big steps forward this week!